



19. NATIONAL ENVIRONMENTAL POLICY ACT IMPLEMENTATION

“When we try to pick out anything by itself, we find it is hitched to everything else in the universe.”¹⁷

The National Environmental Policy Act (NEPA) was created to disclose environmental concerns created by human activities and resolve them to the extent possible. NEPA regulations (AR 200-2, *Environmental Effects of Army Actions*) require mitigation of significant impacts to the environment. NEPA was not legislated to stop actions. Rather, it was crafted to identify and consider environmental problems and attempt to resolve them using planning at early stages of project development.

19-1 Objectives

Military Readiness

- ▶ Ensure no net loss in the capability of installation lands to support existing and projected military missions on Fort Greely.
- ▶ Maintain quality training lands through damage minimization, mitigation, and restoration.

¹⁷ John Muir, Naturalist

Stewardship

- ▶ Involve the surrounding community in Fort Greely's natural resources program.
- ▶ Ensure that Fort Greely's natural resources program is coordinated with other agencies and conservation organizations with similar interests.
- ▶ Identify projects and activities on Fort Greely that might impact natural resources and work with project planners to resolve issues early in the planning process using NEPA.

Compliance

- ▶ Protect and manage sensitive species and wetlands.
- ▶ Use analysis within NEPA to make informed decisions that include natural resources considerations and mitigation.
- ▶ Ensure Fort Greely's natural resources program is consistent with the protection of cultural and historic resources.
- ▶ Use NEPA to analyze the effects of this INRMP.
- ▶ Implement this INRMP within the framework of Army policies and regulations.

Integration

- ▶ Coordinate implementation of natural resources management with the overall Fort Greely environmental program.
- ▶ Use the natural resources program to support and enhance other elements within the USARAK Environmental Program.
- ▶ Provide command elements with information needed to make decisions, which include natural resources-related values.

19-2 Implement NEPA

The most common NEPA document for projects that impact natural resources is a Categorical Exclusion (CX), often with a Record of Environmental Consideration (REC). This simple documentation generally fulfills the NEPA requirement for routine projects, such as vehicle decontamination exercises,

borrow pits, certain small digging projects and similar projects where natural sites are not damaged.

An Environmental Assessment is required when conditions for a CX are not met. This can happen when a new military exercise or range is planned, the action involves a large geographic area, or wetlands or other sensitive plant communities may be involved. Examples include major LRAM projects, targetry clearing, land bridge corridor, or range construction. EAs require the Commander's approval, publishing a Finding of No Significant Impact (FONSI), and waiting 30 days for public comment.

Environmental Impact Statements (EIS) are required when proposed actions result in significant impacts to the environment. Examples of these include major land withdrawals and major military mission changes. Completion of EISs typically requires one year, with multiple-year efforts likely for complex actions.

USARAK must comply with NEPA to ensure its natural resources activities (as described in this INRMP) are properly planned, coordinated, and documented. NEPA documentation is required by the National Environmental Policy Act of 1970 and Army regulations, particularly AR 200-2.

An important benefit of proper NEPA implementation is that projects are often enhanced by the effort. Siting is one of the most common examples of such project enhancement. When natural resources managers understand mission/project requirements in terms of land features and requirements, they often not only offer more potential site options to mission or project planners, but also offer alternatives to avoid environmental conflicts.

The ERD has primary responsibility for NEPA at Fort Greely. Natural resources personnel assist with compliance and documentation. Army Regulation 200-2 (*Environmental Effects of Army Actions*) requires proponents to prepare and fund NEPA documentation. At Fort Greely, proponents sometimes prepare NEPA documentation, which is ideal since it involves project managers (or military unit leaders) in decisions involved with NEPA. However, for most projects, NEPA documents are prepared by ERD.

Siting range-related projects is perhaps the most basic decision that requires input from natural re-

sources personnel. If this phase is done within the cooperative spirit of NEPA, most other environmental problems are generally resolved with relative ease. Decisions, such as specific siting or mission planning will be cooperatively discussed prior to preparing actual NEPA draft documents. NEPA documentation is prepared based on discussions with environmental experts.

In 1998-2002, the installation will take the following steps to improve the use of NEPA to protect and conserve Fort Greely's natural and cultural resources.

- ▶ Review proposed actions during the project concept phases.
- ▶ Ensure mitigation measures are included in the NEPA document when there is a proposed action that will significantly impact natural or cultural resources. If such mitigation is included, ensure that it is entered in the A-106 budget process.
- ▶ Use natural resources programs to provide mitigation. These resources include LRAM, special area protection, wetland management, etc.
- ▶ Track projects to ensure that mitigation is accomplished and that restrictions included within the Record of Environmental Consideration (REC) are followed.
- ▶ Require that routine maintenance projects be evaluated using NEPA. This especially includes projects that disturb soil or clear vegetation.
- ▶ Use the lowest level of NEPA bureaucracy possible to minimize paperwork.

19-2a Mitigation

Project Description. Use mitigation as part of the NEPA process.

Project Justification. NEPA and AR 200-2 require mitigation when a proposed action causes significant impacts to the environment. Mitigation is an excellent way to either force consideration of less damaging options or provide means to offset damage to the environment. Mitigation identified in a Finding of No Significant Impact (FONSI) is a Class 1 "must fund" for environmental purposes. This, for the first time, provides a reliable mechanism to fund mitigation included in NEPA documents.

Project Prescription. NEPA is not intended to end when papers have been signed and approved. NEPA documents are legally binding. Mitigation must be funded and implemented. This implies enforcement on the part of the Natural Resources Branch. It is important to identify problems and determine appropriate corrective actions. For example, when the Military Operations in Urban Terrain Site was constructed as a troop training project, the Environmental Assessment included stabilization of bare mounds of earth as part of mitigation. This was not completed.

On an installation the size of Fort Greely, it is often difficult to check each mitigation site. During 1998-2002, natural resources personnel will be more diligent in enforcing approved mitigation.

19-2b NEPA and This INRMP

Project Description. Prepare an Environmental Assessment for this INRMP (Appendix 1).

Project Justification. USARAK has no NEPA documentation for the Fort Greely natural resources program as a whole. The Environmental Assessment for this INRMP fulfills that requirement. The INRMP and its Environmental Assessment may reduce the size of future Fort Greely NEPA documents. They can be incorporated by reference to reduce verbiage in other NEPA documents.

Project Prescription. Effects of implementing this INRMP are being documented through an Environmental Assessment (Appendix 1). On June 26, 1996, a scoping meeting was held to explain the INRMP planning process to the public and invite public comment. There were no attendees in spite of publicity for a week in the *Fairbanks Daily News Miner*, the major newspaper in the area.

Other more specific action plans may be prepared to support this INRMP during 1998-2002. Each will be supported by appropriate NEPA documentation. Changes or modifications to this plan may constitute a need for additional NEPA documentation.

19-2c Land Withdrawal Renewal Environmental Impact Statement

Project Description. Prepare an Environmental Impact Statement (EIS) for land withdrawals at Fort Wainwright and Fort Greely.

Project Justification. Army land withdrawals on the Yukon Training Area, Fort Wainwright, and most of Fort Greely, expire in November 2001. Public Law 99-606, dated November 1986, requires the military department managing these lands prepare a draft EIS concerning continued use no later than November 6, 1998.

Project Prescription. U.S. Army Alaska initiated preparation of the required environmental documen-

tation in January 1996, using the services of the Center for Ecological Management of Military Lands, Colorado State University. The draft LEIS was published on November 6, 1998.